

Sarah Grossman-Swenson, SBN 11979
McCRACKEN, STEMERMAN & HOLSBERRY, LLP
1630 South Commerce Street, Suite A-1
Las Vegas, Nevada 89102
Phone: (702) 386-5107
Facsimile: (702) 386-9848
Email: sgs@msh.law

*Attorneys for Defendant Culinary Workers Union
Local 226*

Anthony L. Hall, SBN 5977
Jacee Harding, SBN 15709
SIMONS HALL JOHNSTON PC
690 Sierra Rose Dr.
Reno, Nevada 89511
Phone: (775)-785-0088
Email: AHall@SHJNevada.com;
JHarding@SHJNevada.com

Attorneys for Plaintiff Water Street Gaming LLC

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

WATER STREET GAMING LLC, d/b/a
Rainbow Club.

Plaintiff,

v.

CULINARY WORKERS UNION
LOCAL 226,

Defendant.

Case No. 2:24-cv-00297

**STIPULATION FOR EXTENSION
OF TIME FOR DEFENDANT TO
RESPOND TO THE COMPLAINT
PURSUANT TO CIVIL LOCAL
RULE IA 6-1(a)**

(Second Request)

Plaintiff Water Street Gaming LLC d/b/a Rainbow Club (“Rainbow Club”) and Defendant
Culinary Workers Union Local 226 (“Local 226”), by and through their respective attorneys of

record herein, and without waiving any rights, claims, or defenses they have in this action, enter into this Stipulation pursuant to Civil Local Rule 6-1(a) as follows:

WHEREAS, Rainbow Club filed its Amended Complaint on February 13, 2024, ECF No. 2;

WHEREAS, on February 16, 2024, Rainbow Club served its Amended Complaint;

WHEREAS, on March 8, 2024, the Court granted the Parties' Stipulation for Extension of Time for Defendant to respond to the Amended Complaint to April 5, 2024, ECF No. 8;

WHEREAS, the Parties are engaged in substantive settlement discussions;

WHEREAS, in order to see whether the case can be resolved without further involvement of the Court, Plaintiffs have agreed to give Defendant an extension of time to respond to the Complaint of up to and including May 6, 2024;

WHEREAS, the Parties believe that these circumstances constitute good cause for granting a second extension of time to respond because it will conserve judicial and party resources if the Parties can resolve the case without further Court involvement;

WHEREAS, such an extension will not alter any event or deadline already fixed by Court order.

NOW, THEREFORE, the Parties, through their undersigned counsel, hereby stipulate that Local 226 will respond to the Amended Complaint on or before May 6, 2024.

IT IS SO STIPULATED.

MCCRACKEN, STEMERMAN &
HOLSBERRY, LLP

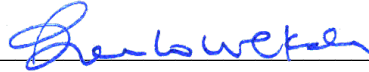
SIMONS HALL JOHNSTON PC

By: /s/Sarah Grossman-Swenson
Sarah Grossman-Swenson, SBN 11979
sgs@msh.law
1630 South Commerce Street
Suite A-1
Las Vegas, Nevada 89102
Attorneys for Defendant

By: /s/ Jacee Harding
Anthony L. Hall, SBN 5977
AHall@SHJNevada.com
Jacee Harding, SBN 15709
JHarding@SHJNevada.com
690 Sierra Rose Dr.
Reno, Nevada 89511
Attorneys for Plaintiff

IT IS SO ORDERED.

Dated: 4/9/2024



PROOF OF SERVICE

I hereby certify that on the 5th day of April, 2024, I served a true and correct copy of the foregoing document:

**STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT TO
RESPOND TO THE COMPLAINT PURSUANT TO CIVIL LOCAL RULE
IA 6-1(a) (Second Request)**

Via electronic filing and electronic mail, addressed as follows:

Anthony L. Hall, SBN 5977
AHall@SHJNevada.com
Jacee Harding, SBN 15709
JHarding@SHJNevada.com
SIMONS HALL JOHNSTON PC
690 Sierra Rose Dr.
Reno, Nevada 89511
Tel: (775)-785-0088
Attorneys for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.


Katherine Pierre